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10 Attorneys for Defendants:  
11 KAISER FOUNDATION HOSPITALS;  
12 THE PERMANENTE MEDICAL GROUP, INC.

13 **UNITED STATES DISTRICT COURT**

14 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO**

15 JAMES PEARSON, ) Case No. 2:20-CV-02335-MCE-KJN  
16 Plaintiff, )  
17 v. ) **SECOND STIPULATION TO  
18 KAISER FOUNDATION HOSPITALS; EXTEND TIME TO RESPOND TO  
19 THE PERMANENTE MEDICAL INITIAL COMPLAINT BY NOT  
20 GROUP, INC., a Corporation doing  
business in the State of California;  
21 COMMONSPIRIT HEALTH, a Colorado  
corporation, d/b/a ST. JOSEPH'S  
BEHAVIORAL HEALTH; and Does 1  
through 20, inclusive )  
22 Defendants. )  
23 )  
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25 )  
26 )  
27 )  
28 )**

29 IT IS HEREBY STIPULATED, by and between plaintiff JAMES PEARSON and  
30 defendants KAISER FOUNDATION HOSPITALS and THE PERMANENTE MEDICAL  
31 GROUP, INC. (referred to herein as "KAISER DEFENDANTS"), through their  
32 undersigned counsel, that the KAISER DEFENDANTS may have up to and including  
33 **January 13, 2021** to file a responsive pleading to plaintiff's Complaint. The extension is  
34 necessary to allow the KAISER DEFENDANTS time to obtain information needed to  
35 respond to the Complaint. This is the second stipulation for an extension of time between  
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1 the parties. This extension does not exceed the twenty-eight (28) days allowed under  
2 Eastern District Local Rule 144(a). Pursuant to Local Rule 144(a), approval of this  
3 stipulation by the Court is not necessary.

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5 **IT IS SO STIPULATED.**

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7 DATED: December 30, 2020

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9 BUTY & CURLIANO LLP

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11 By: /S/ Ondrej Likar  
JASON J. CURLIANO  
ONDREJ LIKAR  
Attorneys for Defendants:  
KAISER FOUNDATION HOSPITALS;  
THE PERMANENTE MEDICAL GROUP, INC.

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13 DATED: December 30, 2020

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15 ALLACCESS LAW GROUP

16 By: /S/ Irakli Karbelashvili [as authorized on 12/30/2020]  
IRAKLI KARBELASHVILI  
Attorneys for Plaintiff:  
JAMES PEARSON

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18 **IT IS SO ORDERED.**

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20 Dated: January 4, 2021

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MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE